

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-143-E
DOCKET NO. 2021-144-E

Application of Duke Energy Progress, LLC for Approval of Smart Saver Solar As Energy Efficiency Program

Application of Duke Energy Carolinas LLC for Approval of Smart Saver Solar as Energy Efficiency Program

Petition to Intervene of the Solar Energy Industries Association

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), the Solar Energy Industries Association (“SEIA”) hereby respectfully petitions to intervene in the above-captioned docket. In support of this petition, SEIA states as follows:

1. On April 23, 2021, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, “Duke Energy” or “Companies”) filed an application with the South Carolina Public Service Commission (“Commission”) for approval of the Smart Saver Solar Energy Efficiency Program (“Program”) to be included in the Companies’ suite of energy efficiency and demand side management programs.

2. The Program is designed to reduce energy consumption by incentivizing the installation of rooftop solar at residential households. Specifically, the Program give Duke Energy customers the option to earn an upfront incentive for installing rooftop solar if they also enroll in the winter-focused Power Manager Load Control Service Rider, known as Bring Your Own Thermostat (“Winter BYOT Program”). The Winter BYOT

Program provides for winter-focused demand response and was previously approved in Order No. 2020-830.

3. The Program is the result of the same collaboration between the Companies and other petitioners in these dockets, including SEIA, that produced the Duke Energy solar choice tariff recently approved by the Commission in Docket Nos. 2020-264-E and 2020-265-E.

4. SEIA is the national trade association of the U.S. solar energy industry, which now employs more than 260,000 Americans. SEIA represents organizations that promote, manufacture, install and support the development of solar energy.

5. SEIA works with its 1,000 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power.

6. Since 1974, SEIA has been a driving force behind solar energy and energy storage technology and building a strong solar industry to power America consistent with its mission to work towards a transformed energy supply and delivery system, such that solar electric and thermal technologies, in collaboration with other clean, reliable, affordable renewable resources and storage, fuel this country's economy.

7. Consistent with its mission, SEIA engages in advocacy and education to foster solar development by expanding markets, removing market barriers, and educating the public on the benefits of solar energy. SEIA actively participates in state public utility commission proceedings, testifies before state legislative bodies, and hosts seminars and events on solar policy issues.

8. SEIA's membership includes many national solar companies that own and operate projects in South Carolina who have local employees as well as companies that list a specific operating address in South Carolina. SEIA's members, including our members in South Carolina, are engaged in manufacturing solar photovoltaic equipment, developing solar photovoltaic projects, providing solar energy equipment, services and expertise to retail, commercial and industrial customers. SEIA's member companies develop, construct, own, operate, finance, and otherwise service solar generating facilities across the state. SEIA members are planning to develop, construct, own, operate, and otherwise service future solar projects in South Carolina, the success of which would rely on the result of this proceeding. SEIA's members in South Carolina directly employ over 3,000 people and have invested collectively over \$2.3 billion in the state.

9. SEIA members' businesses will be directly impacted if more customers are incentivized under the Program to install rooftop solar. As a result, SEIA will be substantially and specifically affected by the result of this proceeding.

10. SEIA's principal place of business 1425 K St NW, Suite 1000, Washington, D.C. 20005.

11. SEIA intervened and was an active participant in the recent net metering dockets affecting the Duke Energy service territory, including Docket Nos. 2019-182-E, 2020-264-E, and 2020-265-E.

12. In this proceeding, SEIA will advocate in support of Duke Energy's application to provide customers with improved access to rooftop solar and additional ways to reduce their energy consumption. More generally, SEIA seeks to promote innovative tariffs, as well as energy efficiency, energy storage, grid services, and demand

side management programs, that reduce reliance on fossil fuels and support the expansion of solar energy in South Carolina.

13. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, SEIA is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

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14. No other party will adequately represent SEIA's interest in this case.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 14th day of July, 2021.

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